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6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
7 **FOR THE COUNTY OF LOS ANGELES**
8

9 MAYRA ALVAREZ, an individual,

10 Plaintiff,

11 v.

12 JOSE HUIZAR, *et al.*,

13 Defendants.
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15
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Case No. 18STCV01722

Assigned for all purposes to Dept. 17
Hon. Richard E. Rico

17 **PLAINTIFF’S OPPOSITION TO**
18 **DEFENDANT JOSE HUIZAR’S**
19 **MOTION TO STAY ALL**
20 **PROCEEDINGS PENDING**
21 **CRIMINAL INVESTIGATION**

Hearing Date: June 24, 2019

Hearing Time: 8:30 a.m.

Action Filed: October 22, 2018

Trial Date: None set

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25 Plaintiff Mayra Alvarez (“Plaintiff” or “Mrs. Alvarez”) hereby submits her Opposition to
26 Defendant Jose Huizar’s (“Defendant” or “Huizar”) Motion to Stay All Proceedings Pending
27 Resolution of Criminal Investigation (“motion”), as follows—
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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

Defendant's motion is unfounded and conjectural and, therefore, should be denied. Huizar's request for a stay is not born out of any genuine desire to protect his constitutional rights, but rather an overriding effort to mitigate further reputational damage to his already stained public persona. Among other things, this lawsuit stems from the retaliatory harassment that Mrs. Alvarez was subjected to by Huizar on account of the complaints she raised about the fact that the Councilmember was having yet another extramarital affair with yet another one of his City staffers. As here, Huizar's first in-office affair also resulted in a harassment lawsuit and was accompanied by negative media attention. This was particularly so given that, as here, taxpayers had to foot the legal bill for Huizar's misconduct. So, Huizar's desire to stay this matter pending a vaguely described "criminal investigation"—one with an unnamed target and undescribed purpose—is simply a stall tactic so that the Councilmember can ride out the rest of his term while continuing to shield his misdeeds from the citizens of this City and continuing to collect a taxpayer-funded paycheck.

But, "the fact that a man is indicted cannot give him a blank check to block all civil litigation on the same or related underlying subject matter. Justice is meted out in both civil and criminal litigation." *Avant! Corp. v. Superior Court, infra*, 79 Cal. App. 4th 876, 882 (2000). And, here, Huizar has not even been indicted. The bottom line is: Huizar has not been charged with a crime; his motion does not affirmatively state that he himself is the target of the FBI's investigation (as opposed to a peripheral witness or subject); nor does Huizar's motion come even remotely close to describing what the FBI is actually investigating such that he can reasonably represent to the Court that criminal charges against him are even possible. Thus, at this point, Huizar's motion appears to be based purely on conjecture, and he is merely using seductive—albeit empty—rhetoric to goad this Court into granting him a reprieve from further public scrutiny and embarrassment. The Court should decline such invitation and deny Defendant's motion unless and until Huizar is either charged with a crime or proffers affirmative evidence that he is the target of the FBI's investigation.

1 **II. NATURE OF THE CASE**

2 **A. Mrs. Alvarez's Allegations Against Huizar and the City of Los Angeles**

3 This is a FEHA-based¹ harassment and retaliation-based wrongful termination suit in
4 which Mayra Alvarez alleges that she was demoted and ultimately forced to resign from the
5 Office of Los Angeles City Councilmember Jose Huizar. As alleged in the Complaint, Huizar's
6 decision to demote Mrs. Alvarez was retaliatory in nature. Among other reasons, Huizar
7 demoted Mrs. Alvarez as reprisal for: (i) taking disability leave in advance of her pregnancy;
8 (ii) taking maternity leave to give birth to a child and bond with her newborn son; (iii) voicing
9 concerns and complaining about having to alter Huizar's calendars in response to requests made
10 pursuant to the California Public Records Act; (iv) voicing concerns and complaining about
11 having to engage in political campaign activities for Huizar's wife during normal City work
12 hours and while utilizing City resources; and (v) voicing concerns and complaining about the
13 preferential treatment Huizar was giving to a City staffer with whom he was having an
14 extramarital affair.

15 Mrs. Alvarez worked for Huizar for nearly a decade, most recently having been promoted
16 to be the Councilmember's Executive Assistant and Scheduler in August 2015. As Huizar's
17 Executive Assistant and Scheduler, Mrs. Alvarez was primarily responsible for performing the
18 initial assessment of the myriad requests to meet with Huizar as well as invitations for him to
19 attend events. The requests came from lobbyists, campaign donors, other community and
20 political leaders, businesspersons, and constituents. In other words, Mrs. Alvarez was among
21 Huizar's chief executive "gatekeepers." She would field the requests, research the requesting
22 party, and provide Huizar with a written assessment of whether the meeting or event request was
23 one he should accept because it aligned his political agenda. In that capacity, Mrs. Alvarez was
24 available to Huizar essentially 24/7. She was by no means Huizar's secretary or receptionist;
25 Mrs. Alvarez was among his senior executive staff. Mrs. Alvarez was young, savvy, and fully
26 committed to the office and her burgeoning career.

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¹ Fair Employment and Housing Act (Cal. Gov. Code § 12940 et seq).

1 However, as Mrs. Alvarez sought to balance the demands of her career and Huizar's
2 political agenda with her desire to start a family, Huizar began to punish and retaliate against
3 Mrs. Alvarez for diverting her attention to anyone or anything other than him.

4 In October 2017, Mrs. Alvarez informed Huizar that she and her husband were expecting
5 their first child. She advised Huizar, as well as the rest of his staff, that she would be taking a
6 12-week maternity leave following the birth of her son in April 2018. Thereafter, as alleged in
7 detail in the Complaint, Huizar harassed and retaliated against Mrs. Alvarez on account of her
8 pregnancy and resultant disability and maternity leaves. Among other things, Huizar
9 unreasonably and unjustifiably increased Mrs. Alvarez's workload, became bitterly impatient
10 with the speed with which she was completing assignments, and unsympathetically criticized
11 Mrs. Alvarez for taking time off to attend prenatal appointments. Huizar's behavior caused
12 Mrs. Alvarez so much stress and anxiety that she began having preterm labor pains at just 16
13 weeks into her pregnancy and later endured two miscarriage scares.

14 Huizar had also begun to retaliating against Mrs. Alvarez on account of her voicing
15 discomfort with some of his and the office's practices which she believed violated local, state,
16 and federal law. For instance, the Los Angeles Times annually requested copies of Huizar's
17 official calendar pursuant to the California Public Records Act. As Huizar's Executive Assistant
18 and Scheduler, Mrs. Alvarez was primarily responsible for maintaining that calendar. However,
19 Huizar would direct Mrs. Alvarez to alter his calendar entries in order to conceal the nature of his
20 meetings from public scrutiny. Huizar did not want the media or general public to know that he
21 was meeting with certain lobbyists and developers—particularly when their particular issue or
22 project was soon to be considered by the City Council or the Planning and Land Use
23 Management Committee (for which Huizar was the chairperson at the time). Those meetings
24 were, of course, often followed close in time by donations to Huizar's campaign coffers.
25 Mrs. Alvarez did not believe that there was any legal basis to withhold the information Huizar
26 directed her to conceal, and voiced her concern about the potential legal and ethical violations
27 of withholding the information, but was compelled by Huizar to do so nonetheless.

1 Mrs. Alvarez also voiced her concern with respect to the potential legal and ethical
2 violations as concerned the candidacy of Huizar's wife, Richelle Huizar, for his seat on the City
3 Council. Although Richelle Huizar only recently announced her candidacy to succeed her
4 husband in September 2018, planning for her potential bid had begun more than a year earlier—
5 and had been occurring on the City's time and dime. Despite local, state, and federal laws
6 prohibiting government employees from engaging in political activity on the job, Huizar required
7 his City staffers to conduct meetings in order to plan Richelle Huizar's campaign. Those
8 meetings were formally calendared and occurred during normal City work hours and within City
9 properties. Furthermore, Huizar directed his staffers to create a secret email address for Richelle
10 Huizar through which they could communicate with her, share his City calendar with her so that
11 she would know which events to attend that might help publicize her potential candidacy, as well
12 as to send her briefings and "talking points" on certain issues. Mrs. Alvarez did not believe that
13 ethics laws permitted City staffers to engage in campaign activities for Huizar's wife while on
14 City time, but was compelled by Huizar to do so nonetheless.

15 Mrs. Alvarez also voiced concern that Huizar was having an affair with one of his City
16 staffers. This caused friction in the office amongst many staffers, Mrs. Alvarez among them,
17 particularly because many believed that Huizar's mistress received more favorable treatment
18 from him with respect to assignments and more leniency with respect to deadlines and
19 attendance.

20 In April 2018, Mrs. Alvarez went on maternity leave. She was still Huizar's Executive
21 Assistant and Administrative Scheduler when she left. When she returned from maternity leave,
22 however, she was not. Huizar demoted Mrs. Alvarez to an office manager position. In other
23 words, Huizar reduced Mrs. Alvarez's executive-level role to that of a receptionist. In fact, that
24 is where Mrs. Alvarez was physically relocated when she returned from leave; whereas she used
25 to sit in the anteroom right outside of Huizar's office along with his other senior advisors, when
26 Mrs. Alvarez returned from maternity leave she was moved to the receptionists' desk at the front
27 of the Councilmember's office suite to greet visitors and answer phones.

1 Mrs. Alvarez's demotion resulted in the loss of all of her pre-leave duties and
2 responsibilities. She was reduced from being the executive adviser primarily responsible for
3 scheduling meetings with Huizar to being the receptionist primarily responsible for reserving
4 conference rooms and ordering ink for the printers. The office manager position was not the
5 same or comparable as her previous position and there was no legitimate business reason
6 unrelated to Mrs. Alvarez's pregnancy, medical leave, gender, and internal complaints that
7 justified the demotion.

8 And Mrs. Alvarez was humiliated. Everyone knew she had been demoted. Despite how
9 Huizar and his Chief of Staff tried to reframe the reassignment, no staffer would ever consider a
10 move from a position as the Councilmember's Executive Scheduler with direct influence over he
11 and the meetings he takes with lobbyists and developers—to a position as the office's lead
12 receptionist with direct influence over ordering office supplies—to be anything other than a
13 demotion. Huizar rendered Mrs. Alvarez useless to the office and, consequently, she had no
14 reasonable alternative but to resign in July 2018.

15 **B. Huizar's Prior In-Office Extramarital Affair and the**
16 **Ensuing Civil Litigation**

17 This is not the first time that Huizar has been sued for harassment as a consequence of his
18 sexual affairs in the workplace. In 2013, another staffer with whom the councilmember was
19 having an affair also sued him for harassment in the matter of *Francine Godoy v. City of Los*
20 *Angeles, et al.*, Los Angeles County Superior Court, Case No. BC524640. That case resolved
21 with a confidential settlement amount and with the City and its residents having footed the bill
22 for the Councilmember's legal fees. And that case, as here, received widespread media coverage
23 that cast Huizar in a negative light.

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1 **III. ARGUMENT**

2 **A. The Law Governing the Issuance of Stays of Civil Proceedings in Light of**
3 **Pending Related Criminal Proceedings**

4 Two of the leading cases on the issue of staying civil proceedings pending the outcome of
5 criminal proceedings—*Pacers* and *Avant!*—each involved a defendant or defendants who were
6 facing potential criminal prosecution and sought to stay pending parallel civil litigation.

7 In *Pacers, Inc. v. Superior Court*, 162 Cal. App. 3d 686 (1984) (“*Pacers*”), the defendants in a
8 civil suit faced with a potential criminal proceeding arising out of the same alleged underlying
9 incident sought to stay the taking of their depositions for approximately two years, when the
10 statute of limitations for potential criminal charges would have lapsed. *Id.* at 689. The *Pacers*
11 court concluded that the trial court erred in denying defendants’ request, reasoning that “[a]n
12 order staying discovery until expiration of the criminal statute of limitations would allow real
13 parties to prepare their lawsuit while alleviating petitioners’ difficult choice between defending
14 either the civil or criminal case.” *Id.* at 690; *see also Fuller v. Superior Court*, 87 Cal. App. 4th
15 299 (2001) (discussing request for stay of deposition by defendant who invokes his privilege
16 against self-incrimination during discovery in civil litigation to avoid exposure to criminal
17 prosecution). The *Pacers* court noted that the remedy it provided was “in accord with federal
18 practice where it has been consistently held that when both civil and criminal proceedings arise
19 out of the same or related transactions, an objecting party is generally entitled to a stay of
20 discovery in the civil action until disposition of the criminal matter.” *Pacers*, 162 Cal. App. 3d
21 at 690 (citations omitted).

22 In *Avant! Corp. v. Superior Court*, 79 Cal. App. 4th 876 (2000) (“*Avant!*”), a corporate
23 defendant in a civil action sought a stay of proceedings during the pendency of a related criminal
24 proceeding in which the corporation, as well as several of its current or former employees, were
25 defendants. As with *Pacers*, the *Avant!* court recognized the delicate balance required to
26 accommodate the interests of both parties under such circumstances. On the one hand, the
27 *Avant!* court recognized that a criminal defendant’s silence is, of course, constitutionally
28

1 guaranteed and that a stay of discovery in a concurrent civil matter may be warranted to protect
2 that right. *See id.* at 882-883. However, the court also recognized that:

3 On the other hand, the fact that a man is indicted cannot give him a blank
4 check to block all civil litigation on the same or related underlying subject
5 matter. Justice is meted out in both civil and criminal litigation. The
6 overall interest of the courts that justice be done may very well require
7 that the compensation and remedy due a civil plaintiff should not be
8 delayed (and possibly denied).

9 *Id.* at 882 (citation omitted).

10 Thus, in concluding that the trial court had not abused its discretion in denying the
11 motion to stay, the *Avant!* court listed the factors that a trial court should consider in ruling on
12 such a motion: (1) the interest of the plaintiffs in proceeding expeditiously with this litigation or
13 any particular aspect of it, and the potential prejudice to plaintiffs of a delay; (2) the burden
14 which any particular aspect of the proceedings may impose on defendants; (3) the convenience
15 of the court in the management of its cases, and the efficient use of judicial resources; (4) the
16 interests of persons not parties to the civil litigation; and (5) the interest of the public in the
17 pending civil and criminal litigation. *Id.* at 885; citing *Keating v. Office of Thrift Supervision*,
18 *infra*, 45 F.3d 322, 324-325 (9th Cir. 1995) (“*Keating*”).

19 **B. Huizar Has Not Demonstrated Sufficient Grounds for a Stay**

20 1. Huizar Has Not Established that this Civil Action and the Criminal
21 Investigation Arise Out of the Same or Related Transactions

22 As the *Pacers* court emphasized, a stay of discovery may be an appropriate remedy
23 “when both civil and criminal proceedings arise out of the *same or related transactions*”
24 *Pacers*, 162 Cal. App. 3d at 690 (emphasis). But, here, Huizar’s motion fails altogether to
25 describe what “transactions” are at issue in the criminal investigation, nor how they might be the
26 “same or related” to the allegations giving rise to this civil action. Although Huizar’s motion
27 certainly summarizes many of the activities that Mrs. Alvarez witnessed while working in the
28 Councilmember’s office that she reasonably perceived to be violations of the law, (*see* Def. Mtn.
at pg. 3, ln. 23 – pg. 4, ln. 11), Huizar’s motion says nothing about whether Mrs. Alvarez’s
allegations are, in fact, part of the criminal investigation. In other words, Huizar wants the Court

1 to stay discovery because of the similarities between this civil case and a criminal investigation,
2 but his motion does not even come remotely close to telling the Court what the criminal
3 investigation is all about. Thus, without more information, there is no way the Court can
4 reasonably assess whether this civil action has any relation to any criminal investigation, and
5 whether there is any danger of self-incrimination.

6 Certainly, Huizar’s motion strings together a myriad of salacious phrases that invoke
7 purported danger to his constitutional rights; but without any supporting facts, his threats really
8 just amount to empty rhetoric. For instance, Huizar contends that the allegations Mrs. Alvarez
9 “makes in her complaint *directly overlap* with the ongoing investigation” and that Mrs. Alvarez’s
10 claims of “whistleblower retaliation likely *spring from the same nucleus of facts* as the pending
11 criminal investigation.” *See* Def. Mtn. at 7:2-6 (citations and internal quotations marks omitted;
12 emphasis added). But, Huizar’s moving papers fail entirely to describe what the basis of the
13 criminal investigation actually is such that we can assess any purported “overlap” or shared
14 “nucleus of facts.” So, too, do his moving papers fail to declare whether Huizar is an actual
15 target of the investigation or merely a peripheral witness to, or subject of, the inquiry.² If Huizar
16 is aware that he is the primary target of a criminal investigation, then he should affirmatively
17 say so; otherwise, his motion is based upon pure speculation.

18 As Defendant’s moving papers point out, (*see* Andruess Decl. at ¶ 5, fn. 1), the
19 undersigned counsel was an Assistant United States Attorney in the U.S. Attorney’s Office for
20 this very judicial district for nearly eight years, so is quite familiar with the realities of being
21 investigated by federal authorities. And, to be sure, being part of an investigation and actually
22 being prosecuted are two very different things. There are many people and entities from whom
23 federal law enforcement officers seek information and documentation—irrespective of whether
24 some *other* person or entity is the actual target of the probe. Therefore, just because the
25 Councilmember has made seductive reference to an “ongoing, and far-reaching” federal criminal
26 investigation, (*see* Def. Mtn. at pg. 4, lns. 14-18), does not necessarily mean that he is in present

27 ² *See* U.S. Department of Justice “Justice Manual” (previously known as the “United States
28 Attorneys’ Manual”), <https://www.justice.gov/jm/justice-manual>, at 9-11.151, defining “target”
and “subject.”

1 danger of jeopardizing his constitutional rights if discovery moves forward in this civil wrongful
2 termination action. And, indeed, based upon Huizar’s moving papers, it appears that the source
3 of his information about the nature of the investigation is the *media*—

4 *Based on newspaper articles and media reports*, the search warrants
5 appear to be part of an ongoing, and far-reaching, federal criminal and
6 ethics investigation

6 See Def. Mtn. at pg. 4, lns. 14-18; emphasis added.

7 The Court need not rely upon media speculation and supposition to render its decision
8 here, but instead base its ruling on the facts brought before it. And what is most compelling
9 about Huizar’s motion are the facts that he has *not* put before this Court. Huizar’s moving
10 papers do not describe, for instance: any correspondence between his counsel and federal
11 authorities discussing the nature of the criminal investigation; whether he has been formally
12 deemed a “target” by federal authorities; whether he has been interviewed in the context of the
13 criminal investigation or otherwise met informally with federal authorities; or whether he is
14 engaged in any pre-indictment plea negotiations. Such information might assist the Court in
15 determining whether there is, in fact, any overlap between this civil matter and any criminal
16 investigation. Until such facts are presented (even if under seal or *in camera*), Huizar’s request
17 for a stay is unfounded and premature.

18 2. The Keating Factors Militate Against Granting a Stay

19 Even where the civil discovery process is directed against an individual defendant who is
20 also a defendant in a related criminal case, the Ninth Circuit has held that “[t]he Constitution
21 does not ordinarily require a stay of civil proceedings pending the outcome of criminal
22 proceedings.” *Keating, supra*, 45 F.3d at 324. As above, California courts have utilized the five
23 *Keating* factors to fashion a remedy that would protect individuals’ Fifth Amendment interests
24 while also subjecting them to the compulsion of civil discovery. In this case, the *Keating* factors
25 weigh in favor of permitting discovery proceed forward in this case.

26 a. *The Interests of Mrs. Alvarez*

27 As the *Avant!* court recognized, “there is hardly a question of the interest of [the party
28 opposing the stay] in proceeding expeditiously with this litigation or any particular aspect of it,”

1 since granting a stay “would increase the danger of prejudice resulting from the loss of evidence,
2 including the inability of witnesses to recall specific facts, or the possible death of a party.”
3 *Avant!*, 79 Cal. App. 4th at 887 (citation omitted). Here, Mrs. Alvarez certainly has an interest in
4 proceeding expeditiously with this litigation so that she can achieve a just, fair, and speedy
5 resolution to the case and appropriate recompense for her wrongful termination.

6 *b. The Burden on Huizar*

7 There is no clear burden to Huizar because, as above, he has failed to describe the basis
8 of the criminal investigation, the depth of his involvement in it, and whether there is any
9 reasonable overlap with this civil proceeding.

10 *c. The Convenience of the Court*

11 As the *Avant!* court stated, “[c]learly, denial of the stay motion promotes the convenience
12 of the court in the management of its cases.” *Avant!*, 79 Cal. App. 4th at 888. Moreover, given
13 the lack of information about the criminal investigation, the Court cannot even reasonably
14 fashion a remedy based upon any applicable criminal statutes of limitations. *See Fuller, supra*,
15 87 Cal. App. 4th at 307-308 (trial court did not abuse its discretion in refusing to stay the civil
16 proceedings until expiration of the criminal statute of limitations, which would not have expired
17 until three years beyond the scheduled trial date). Huizar apparently seeks a stay for an
18 interminable amount of time, which is patently unfair to Plaintiff.

19 *d. The Interests of Non-Parties*

20 As the *Avant!* court also emphasized, denial of the request for a stay promoted the
21 public’s interest in maintaining “a system that encourages individuals to come to court for the
22 settlement of their disputes.” *Id.* at 889. Here, Plaintiff believes there are other present and
23 former staffers to the Councilman that would also like to pursue legal action against him for
24 harassment, intimidation, and retaliation for raising complaints about his misconduct. Yet, those
25 employees are fearful of doing so because of the power and influence Huizar wields with other
26 City departments with whom those employees would like to seek employment. The staffers have
27 seen in the past how Huizar has wielded his political influence to derail other staffers’ pursuits of
28 other opportunities within City government and do not want the same fate to befall them. Those

1 staffers are watching the pace and outcome of this matter as they consider whether to come
2 forward, and an unreasonable delay will discourage them from pursuing the justice they seek and
3 deserve.

4 *e. The Interests of the Public*

5 Plainly, what the Councilmember is really fearful of is not how the ordinary and public
6 litigation of this case might jeopardize his constitutional rights, but instead how negative media
7 coverage might impact his political reputation—particularly since this is Huizar’s second
8 in-office affair that has resulted in a second round of lawsuits against he and the City. So,
9 the Councilmember’s efforts to stall this case are not born out of any real concern for his
10 constitutional interests, but rather as an effort to conceal from the public the fact that he has had
11 yet another inappropriate in-office escapade and that taxpayers may again have to pay for it.

12 But that is precisely why his motion should be denied. Our elected officials—perhaps
13 more than any other litigant—owe the public the right to follow the litigation of accusations of
14 misconduct in public office, in a public forum, and with all due expedience. Councilmember
15 Huizar should not be permitted to hide the truth from the public for a second time when he has
16 breached the public’s trust for a second time.


17 **IV. CONCLUSION**

18 Based on the foregoing, Plaintiff respectfully requests that the Court deny Defendant
19 Huizar’s motion.

20
21 Dated: June 6, 2019

THE LAW OFFICE OF TERRENCE JONES

22
23 By: _____


Terrence M. Jones

24 Attorneys for Plaintiff MAYRA ALVAREZ
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PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is as follows: The Law Office of Terrence Jones, 6737 Bright Avenue, Suite B6, Whittier, California 90601.

On **June 6, 2019**, I served the document(s) listed immediately below on each person(s) and/or entity(ies) named below by causing the document(s) to be mailed, hand-delivered, e-mailed, or faxed, as indicated herein:

▪ **Plaintiff's Opposition to Defendant Jose Huizar's Motion to Stay**


Person(s) and/or entity(ies) to whom/which the above document(s) were mailed:

<p style="text-align: center;">Dennis Kong Kelly Welch LOS ANGELES CITY ATTORNEY'S OFFICE 200 N. Main St., 7th Flr. Los Angeles, CA 90012 <i>Counsel for Defendant City of Los Angeles</i></p>	<p style="text-align: center;">Linda Miller Savitt James Demerjian BALLARD ROSENBERG GOLPER & SAVITT LLP 15760 Ventura Blvd., 18th Flr. Encino, CA 91436 <i>Counsel for Defendant Jose Huizar</i></p>
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- ☐ BY MAIL I caused such envelope with postage fully prepaid thereon to be placed in the United States Mail within Los Angeles County.
- ☒ BY OVERNIGHT MAIL I caused such document(s) to be placed in a box or other facility regularly maintained by an express mail carrier, in an envelope designated by such carrier with delivery fees fully prepaid thereon, or provided for, addressed to the person on whom it is to be served, within Los Angeles County.
- ☐ BY FACSIMILE I caused such document(s) to be faxed to the following number(s):
- ☐ BY HAND-DELIVERY I caused such document(s) to be delivered by hand to each person(s) and/or entity(ies) named above.
- ☐ BY E-MAIL I caused such document(s) to be electronically transmitted to the following e-mail address(es):

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **June 6, 2019**, at Whittier, California.



Terrence M. Jones, Esq.